

DRAFT Revisions

6 NYCRR Part 208 – Landfill Gas Collection and Control Systems for certain Municipal Solid Waste Landfills

6 NYCRR Part 200 – General Provisions

1. Revised Part 208 will consist of the new federal Emission Guidelines (EG) 40 CFR Part 60, Subpart Cf, “Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills,” as incorporated by reference in 6 NYCRR Part 200.
 - a. Subpart Cf has replaced federal EG Subpart Cc and the New Source Performance Standard (NSPS) 40 CFR Part 60, Subpart WWW.
 - b. Subpart Cf applies to “existing” landfills that have accepted waste after November 8, 1987 and began construction, reconstruction or modification prior to July 17, 2014.
2. Landfill sizes (design capacity threshold) that trigger rule provisions remain at 2.5 million megagrams (Mg) and 2.5 million cubic meters (m³) of waste.
3. Non-Methane Organic Compounds (NMOC) emission trigger threshold for installing and removing a gas collection and control system (GCCS) revisions:
 - a. Lowered from 50 Mg/yr to 34 Mg/yr.
 - b. Tier 4 Surface Emissions Monitoring (SEM) methane at 500 parts per million (ppm) or greater.
 - c. Closed landfills (Subcategory) remain at 50 Mg/yr.
 - d. Have 30 months to install and operate a GCCS.
4. Optional “Tier 4” emission threshold methodology for installing/operating a GCCS:
 - a. NMOC emissions must be ≥ 34 Mg/yr and < 50 Mg/yr using Tier 1 or Tier 2.
 - b. Site-specific SEM methane < 500 ppm for four consecutive quarters, not required to install a GCCS.
 - c. Continue to report NMOC emissions annually.
 - d. Requires notification of testing, electronic reporting, and recordkeeping.
 - e. Landfills actively operating a GCCS can use Tier 4 to remain exempt from the GCCS monitoring and reporting requirements.
5. Closed Landfill Subcategory:
 - a. Closure report submitted within one year of Part 208 becoming effective.
 - b. Closed landfills emissions threshold remains 50 Mg/yr.
 - c. Exempt from initial reporting requirements, provided they already met the existing requirements under Part 208 or Subpart WWW.
6. Requirements for Landfill Gas Treatment:
 - a. Defining “treated landfill gas” – meaning landfill gas processed in a “treatment system” – meaning a system that filters, de-waters, and compresses landfill gas for sale or beneficial use.

- b. Beneficial use expanded to vehicle fuels, high-Btu gas for pipeline injection, raw material for chemical manufacturing processes.
- c. Requires site-specific “treatment system monitoring plan.”

7. Wellhead Operational Standards:

- a. Removes the operational standards for oxygen/nitrogen and corresponding corrective action for their exceedances, but maintains the monthly wellhead monitoring and recordkeeping.
- b. Maintains negative pressure and temperature (less than 55 °C) requirements:
 - i. Well corrections new tiered system for alternative timeframes:
 - 1. Maintains the 5/15-day adjustments.
 - 2. Up to 60 days: Perform root cause analysis to investigate and determine appropriate corrective action(s).
 - 3. 60 to 120 days: Conduct a correction action analysis, develop an implementation schedule, and notify the Department within 75 days.
 - 4. More than 120 days: Submit root cause analysis, corrective action analysis, and implementation timeline to the Department for approval within 75 days.

8. SEM testing requirements where a GCCS is already in place:

- a. Maintain quarterly monitoring - 500 ppm methane.
- b. Monitor all cover penetrations and openings.
- c. Mark, record and report exceedances (>500 ppm) using an instrument providing latitude/longitude coordinates.

9. Maintain GCCS Design Plans:

- a. Continue with design plans prepared/approved by a professional engineer.
- b. Requires only notification and signature page when plan is completed.
- c. New requirements for when GCCS design plans are to be updated.

10. Startup, Shutdown, and Malfunction (SSM) provisions:

- a. Removes 5-day (collection system) and 1-hour (treatment/control device) downtime limitations.
- b. Standards apply at all times, including periods of SSM.
- c. Comply with recordkeeping/reporting requirements.

11. Reporting for landfills recirculating Leachate or adding Other Liquids:

- a. No new category for “wet” landfills.
- b. Design capacity \geq 2.5 million Mg must report data.
- c. Report annually electronically to EPA.
- d. Initial report historical data going back 10-years.
- e. Report volume, surface area, and waste disposed.
- f. Landfills in the “closed landfill subcategory” are exempt.

12. Requirements for Electronic Reporting:

- a. EPA’s web portal the Central Data Exchange (CDX), using the Compliance and Emissions Data reporting Interface (CEDRI).

- b. Required reports: performance test reports, NMOC emissions rate reports, annual reports, Tier 4 emission rate reports, and wet landfilling practices.
- c. Provide electronically only where available, otherwise, submit to EPA through normal route.

13. Twenty-five new definitions:

- a. Household Waste: clarifies confusion between household waste/segregated yard waste/C&D and avoid enforcement actions.